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March 11, 2016

VIA ECF

Honorable Robert W. Sweet  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, New York 10007-1312

Re: *Elsevier, Inc., et al. v. Sci-Hub, et al.*, 15-cv-4282 (RWS)

Dear Judge Sweet,

We are counsel to Elsevier Inc, Elsevier B. V., and Elsevier Ltd. ("Elsevier") in the above captioned action. We write in regards to the pretrial conference currently scheduled for March 17, 2016.

As the court is aware, none of the defendants have entered an appearance in this matter and, as a result, we do not expect that any of the defendants will be present for the conference. We are also aware that defendant Elbakyan has apparently defied this Court's preliminary injunction by continuing her piracy activities directed against Plaintiffs. Plaintiffs are continuing to investigate the nature and extent of this, including the identities of the Doe defendants and potential additional remedies against them as well as defendant Elbakyan. Accordingly, Plaintiffs respectfully request a six week adjournment, to April 28, 2016, or another date convenient to the Court, in order to continue to seek to identify defendants and to investigate defendant Elbakyan's continued wrongdoing.

Respectfully submitted,

/s/ Joseph DeMarco

